

MARJIE D. BARROWS (SBN 122129)
KATHLEEN M. DeLANEY (SBN 196376)
FORAN GLENNON PALANDECH PONZI & RUDLOFF PC
2000 Powell Street, Suite 900
Emeryville, CA 94608
Telephone: (510) 740-1500
Facsimile: (510) 740-1501
E-mail: mbarrows@fgppr.com
E-mail: kdelaney@fgppr.com

Attorneys for Defendant THE AMERICAN
INSURANCE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA – FRESNO DIVISION

THE MEAT MARKET, INC., dba
STATE CENTER FOODS,

Plaintiff,

vs.

THE AMERICAN INSURANCE
COMPANY and DOES 1 through 50,
inclusive,

Defendants.

No. 1:11-CV-00983-AWI DLB

**STIPULATION TO CONTINUE
DISCLOSURE OF EXPERTS;
ORDER THEREON**

Trial Date: December 2, 2012

/

TO THE HONORABLE DENNIS L. BECK, UNITED STATES DISTRICT COURT
MAGISTRATE JUDGE:

STIPULATION

WHEREAS, Plaintiff THE MEAT MARKET, INC. and Defendant THE
AMERICAN INSURANCE COMPANY desire to continue the parties' last day to disclose
expert witnesses and supplemental expert witnesses, on the following grounds:

1. Counsel for both parties have worked diligently to complete written
discovery and schedule percipient depositions, but because percipient discovery is not yet
complete, counsel find that they cannot meet the existing deadlines for the parties'

-1-

disclosure of expert witnesses and supplemental expert witnesses and
STIPULATION TO CONTINUE DISCLOSURE OF EXPERTS

CASE NO. 1:11-CV-00983-AWI DLB

ATTORNEYS
OWENOSPREET, SUITE 900
ILLEMERYVORNIA 94608
(516)004

RUDLOFF

2. This would be the first continuance of this deadline in this matter.

NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff
THE MEAT MARKET, INC. and Defendant THE AMERICAN INSURANCE
COMPANY hereby stipulate to the following:

1. The last day for the parties to disclose expert witnesses with reports is
continued to June 15, 2012; and

2. The last day for the parties to disclose supplemental expert witnesses
with reports is continued to June 29, 2012.

DATED: April 10, 2012

**FORAN GLENNON PALANDECH
PONZI & RUDLOFF PC**

By: /s/ Kathleen M. DeLaney
Marjie D. Barrows
Kathleen M. DeLaney

Attorneys for Defendant
**THE AMERICAN INSURANCE
COMPANY**

DATED: April 10, 2012

HOPPE LAW GROUP

By: /s/ Barbara J. Rueger
Theodore W. Hoppe
Barbara J. Rueger

Attorneys for Plaintiff
**THE MEAT MARKET, INC., dba STATE
CENTER FOODS**

ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, as follows:

1. The last day for the parties to disclose expert witnesses with reports is continued to June 15, 2012; and

2. The last day for the parties to disclose supplemental expert witnesses with reports is continued to June 29, 2012.

IT IS SO ORDERED.

Date: 11 April 2012
HONORABLE
United

/s/ Dennis L. Beck
DENNIS L. BECK
States Magistrate Judge